

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:05-cv-00329-TCK-SAJ
)	
TYSON FOODS, INC., et al.,)	
)	
Defendants.)	

**OBJECTIONS AND RESPONSES TO
INTERROGATORIES AND REQUEST FOR PRODUCTION
OF INTEGRATOR DEFENDANT SIMMONS FOODS, INC.**

The Plaintiff State of Oklahoma respectfully submits its objections and responses to Defendant Simmons Foods, Inc's interrogatories and request for production of documents propounded to Plaintiffs. The State maintains numerous records at many agencies and its record review is ongoing. The State shall supplement the following responses and attached privilege logs should additional responsive or privilege-protected documents come to its attention.

GENERAL OBJECTIONS

1. The State objects to these discovery requests to the extent that they seek the discovery of information that is protected by the attorney-client privilege and/or the work product doctrine.

2. The State objects to these discovery requests to the extent that they seek the discovery of information that is already in the possession of defendant, is obtainable from another source that is more convenient, less burdensome or less expensive, or is as accessible to defendant as it is to the State. As such, the burden of obtaining such sought-after information is substantially the same, or less, for defendant as it is for the State.

3. The State objects to these discovery requests to the extent that they are overly broad, oppressive, unduly burdensome and expensive to answer. Providing answers to such discovery requests would needlessly and improperly burden the State.

4. The State objects to these discovery requests to the extent that they improperly seek identification of “all” items or “each” item of responsive information. Such discovery requests are thus overly broad and unduly burdensome. It may be impossible to locate “all” items or “each” item of responsive information to such discovery requests.

5. The State objects to the extent that discovery sought is unreasonably cumulative or duplicative.

6. The State objects to these discovery requests to the extent that they do not state with the required degree of specificity and particularity what information is being sought. As such, such discovery requests are vague, indefinite, ambiguous and not susceptible to easily discernible meaning.

7. The state objects to these discovery requests to the extent that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties resources, and the importance of the proposed discovery in resolving the issues.

8. The State objects to these discovery requests to the extent that they improperly attempt to impose obligations on the State other than those imposed or authorized by the Federal Rules of Civil Procedure.

9. The State objects to the definitions of these discovery requests to the extent that they improperly attempt to alter the plain meaning of certain words.

10. By submitting these responses, the State does not acknowledge that the requested information is necessarily relevant or admissible. The State Expressly reserves the right to object to further discovery into the subject matter of any information provided and to the introduction of such information into evidence.

OBJECTIONS AND RESPONSES TO INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

INTERROGATORY NO. 1: For each calendar year, 1985 through 2005, state the total P loading for that year to Lake Tenkiller resulting from the land application of poultry litter in the Illinois River Watershed.

OBJECTIONS AND RESPONSES TO NO. 1: The State objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege and/or work production protection.

The State objects to this interrogatory to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which experts retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(c), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26. Thus, the State also objects to this interrogatory to the extent it calls for information which constitutes expert opinions, the disclosure of which is premature.

The State also objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the its privilege log. Also, pursuant to LCvR 26.4(b), the

attached privilege log does not contain any work product protection material or attorney-client privileged material created after the commencement of this action on June 13, 2005. The State reserves its work product protection claim and attorney-client privilege claim for all such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for protected or privileged materials created after the commencement of this action or if the State identifies additional documents subject to a claim of privilege or protection.

The State objects to this interrogatory on the grounds that it improperly seeks identification of “all” items of responsive information, which renders it overly broad, oppressive, unduly burdensome and expensive to answer. It may be impossible to locate “all” items of responsive information to this interrogatory.

The State further objects to this interrogatory to the extent this information has already been provided to the Poultry Integrator Defendants in responses to previous interrogatories and/or in response to one or more Open Records Requests made by one or more of the Poultry Integrator Defendants.

Subject to and without waiving its general or specific objections, and pursuant to Fed.R.Civ.P. 33(d), information sought in this Interrogatory, and whose production is not objected to herein, may be found within the business records being provided to this Defendant. Identification of such business records will occur on a rolling basis as the State's review of its business records proceeds.

The State reserves its right to supplement its answer to this interrogatory pursuant to Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 2: For each calendar year, 1985 through 2005, state the total N loading for that year to Lake Tenkiller resulting from the land application of poultry litter in the Illinois River Watershed.

OBJECTIONS AND RESPONSES TO NO. 2: The State objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege and/or work production protection.

The State objects to this interrogatory to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which experts retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(c), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26. Thus, the State also objects to this interrogatory to the extent it calls for information which constitutes expert opinions, the disclosure of which is premature.

The State also objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the its privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any work product protection material or attorney-client privileged material created after the commencement of this action on June 13, 2005. The State reserves its work product protection claim and attorney-client privilege claim for all such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for protected or privileged materials created after the commencement of this action or if the State identifies additional

documents subject to a claim of privilege or protection

Subject to and without waiving its general or specific objections, and pursuant to Fed.R.Civ.P. 33(d), information sought in this Interrogatory, and whose production is not objected to herein, may be found within the business records being provided to this Defendant. Identification of such business records will occur on a rolling basis as the State's review of its business records proceeds.

The State reserves its right to supplement its answer to this interrogatory pursuant to Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 3: For each of your answers to Interrogatories Number One and Two, state the amounts which came from poultry growers under contract with Simmons Foods, Inc.

OBJECTIONS AND RESPONSE TO NO. 3: The State objects to this interrogatory to the extent it seeks the discovery of information that is protected by the attorney client privilege and / or the work product doctrine.

The State objects to this interrogatory to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the State has not determined which experts retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)(c), nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26. Thus, the State also objects to this interrogatory to the extent it calls for information which constitutes expert opinions, the disclosure of which is premature.

The State also objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the its privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any work product protection material or attorney-client privileged material created after the commencement of this action on June 13, 2005. The State reserves its work product protection claim and attorney-client privilege claim for all such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for protected or privileged materials created after the commencement of this action or if the State identifies additional documents subject to a claim of privilege or protection.

Under the State's CERCLA and common law claims the liability of the Poultry Integrator Defendants in this action is joint and several, and it is the responsibility of the Poultry Integrator Defendants to meet the heavy burden of showing the injury is divisible (if that can be shown at all). Indeed, the State has asserted that the injury is indivisible. In the present case, information to assess the relative contribution of the Poultry Integrator Defendants, if it exists at all, is in the hands of the Poultry Integrator Defendants, whose burden it is to establish divisibility. Accordingly the State objects.

Subject to and without waiving its general and specific objections, the State of Oklahoma states that Defendant Simmons and/or persons, activities or entities for which Defendant Simmons is legally responsible have contributed P and N loading to Lake Tenkiller during the indicated period.

To the extent any reports, studies, publications, research, modeling, sampling data or monitoring data exists in the public domain, such information is equally accessible to the Poultry Integrator Defendants

and the burden of obtaining such information is substantially the same for the Poultry Integrator Defendants as it for the State. Accordingly, the State objects.

The State reserves its right to supplement its answer to this interrogatory pursuant to Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 4: For each of your answers to Interrogatories Number One and Two, tell us how you know. Be complete.

OBJECTIONS AND RESPONSES TO NO. 4: See Objections and Responses to Interrogatories 1 and 2, which are incorporated herein.

REQUEST FOR PRODUCTION NO. 1: Produce copies of all studies, datasets, articles and any other documents which support your answers to Interrogatories Number One through Four.

OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 1: See Objections and Responses to Interrogatories 1-4, which are incorporated herein.

INTERROGATORY NO. 5: Provide the name, address and telephone number of all persons who have suffered any adverse health effect as a result of water contact in the Illinois River Watershed which was caused by the land application of poultry litter.

OBJECTIONS AND RESPONSE TO NO. 5: The State objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege and/or work production protection.

The State objects to this interrogatory to the extent that it is ambiguous. The State is unclear what “any adverse health effect” means and accordingly the State objects.

The State objects to this interrogatory to the extent that it seeks information known or opinions held by expert consultants retained or specially employed by the State or by its counsel in anticipation of litigation or preparation for trial. Fed. R. Civ. P. 26(b)(4)(A) and (B). As of the date of this response, the

State has not determined which experts retained by it or by its counsel will provide expert testimony in this case, and the Court has neither established the times and sequence of disclosure of such expert witnesses pursuant to Fed. R. Civ. P. 26(a)(2)©, nor has the Court established a trial date to trigger the obligation of expert disclosure 90 days in advance of trial under that rule. The State will comply with the order of the Court establishing the time of expert disclosures as required by Fed. R. Civ. P. 26. Thus, the State also objects to this interrogatory to the extent it calls for information which constitutes expert opinions, the disclosure of which is premature.

The State also objects pursuant to Fed. R. Civ. P. 26(b)(3) to any discovery of documents or tangible things prepared in anticipation of litigation or for trial by it or by consultants retained by it or by its counsel.

Pursuant to Fed. R. Civ. P. 26(b)(5) and LCvR 26.4, the State's claim of attorney-client privilege and work product protection is supported by the its privilege log. Also, pursuant to LCvR 26.4(b), the attached privilege log does not contain any work product protection material or attorney-client privileged material created after the commencement of this action on June 13, 2005. The State reserves its work product protection claim and attorney-client privilege claim for all such materials, and reserves its right to supplement the attached privilege log should the Court enter any order requiring a log for protected or privileged materials created after the commencement of this action or if the State identifies additional documents subject to a claim of privilege or protection.

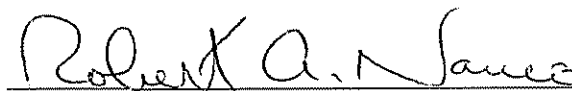
The State objects to this interrogatory on the grounds that it improperly seeks identification of "all" items of responsive information, which renders it overly broad, oppressive, unduly burdensome and expensive to answer. It may be impossible to locate "all" items of responsive information to this interrogatory.

Without waiving the foregoing objections, the State responds by stating that health risks from the improper and concentrated release and disposal of poultry waste in the IRW include, but are not limited to, infection by bacteria or other pathogens, presence of trihalomethanes in drinking water, with the potential for formation of more, nitrate pollution of groundwater, toxic blue-green algae, and the effects of arsenic and other heavy metals. The State is currently investigating reports of illness caused by the Defendants improper waste disposal activities. The State reserves its right to supplement its answer to this interrogatory pursuant to Fed. R. Civ. P. 26(e).

Respectfully submitted,

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June 15, 2006

VERIFICATION

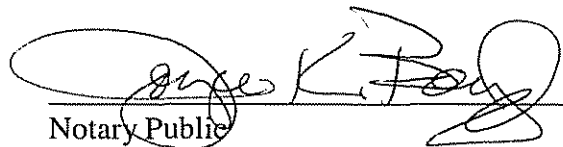
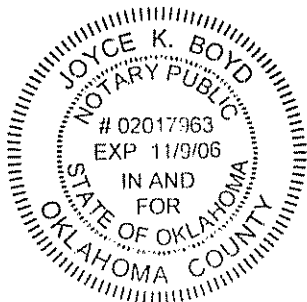
STATE OF OKLAHOMA)
) ss:
COUNTY OF OKLAHOMA)

I, Miles Tolbert, being of legal age, hereby depose and state that I have read the foregoing responses to interrogatories and that they are true and correct, to the best of my knowledge and belief, and and that I furnish such responses based on consultation with representatives of the State of Oklahoma based on documents identified as of the date of this response.



Miles Tolbert
Secretary of the Environment
State of Oklahoma

Signed and subscribed to before me on this 15th day of June, 2006.


Notary Public

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2006, I electronically transmitted the foregoing document to the following ECF registrants or via United States Mail postage prepaid to the following:

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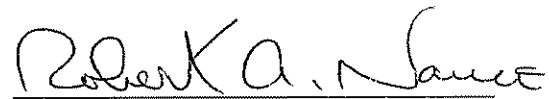
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Robert A. Nance

State of Oklahoma, et al. v. Tyson Foods, Inc., et al.
Privilege Log

	Date	Author	Is Author a Lawyer?	Recipient(s)	Type of Document	General Subject Matter of the Document	Privilege Asserted <i>FRCP</i>	Bates Number(s)
280	2004/11/15	Lithochimeia, Inc.	No	Stratus Consulting, Inc., Miller Keffer Bullock Pedigo LLC, Landreth Law Firm	e-mail	correspondence regarding manure-borne estrogens	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
281	2005/04/12	Landreth Law Firm	Yes	Landreth Law Firm, Miller Keffer Bullock Pedigo LLC, Oklahoma Office of the Attorney General	e-mail	correspondence regarding damages and remediation	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
282	2005/03/29	Oklahoma Office of the Attorney General	Yes	Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc., Landreth Law Firm	e-mail	correspondence regarding arsenic from poultry litter	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
283	2005/01/27	Miller Keffer Bullock Pedigo LLC	Yes	Lithochimeia, Inc., Stratus Consulting, Inc., Camp Dresser & McKee, Inc., HydroQual (cc: Oklahoma Office of the Attorney General, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc., Motley Rice LLC, Landreth Law Firm)	e-mail	correspondence regarding re-damage proof and evidence issues	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
284	2005/01/18	Miller Keffer Bullock Pedigo LLC	Yes	Stratus Consulting, Inc., Lithochimeia, Inc., Camp Dresser & McKee, Inc.	e-mail	correspondence regarding and attaching draft Items of Proof	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
285	2005/01/07	Miller Keffer Bullock Pedigo LLC	Yes	Landreth Law Firm	e-mail	correspondence regarding settlement issues	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none

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	Date	Author	Is Author a Lawyer?	Recipient(s)	Type of Document	General Subject Matter of the Document	Privilege Asserted <i>FRCP</i>	Bates Number(s)
286	2004/12/07	Stratus Consulting, Inc.	No	Landreth Law Firm (cc: Miller Keffer Bullock Pedigo LLC)	e-mail	correspondence regarding Federal Register document FRL 7845-7, "Notice of Proposed NPDES General Permit for Discharges From Concentrated Animal Feeding Operations (CAFOs) in New Mexico, Oklahoma, and on Indian Lands in New Mexico and Oklahoma"	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
287	2005/04/13	Stratus Consulting, Inc.	No	Landreth Law Firm, Miller Keffer Bullock Pedigo LLC (cc: Oklahoma Office of the Attorney General)	e-mail	correspondence regarding damage and remediation	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
288	2005/04/12	Stratus Consulting, Inc.	No	Miller Keffer Bullock Pedigo LLC, Landreth Law Firm (cc: Oklahoma Office of the Attorney General)	e-mail	correspondence regarding damage and remediation	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
289	various dates in 2004	various authors including those from the Oklahoma Office of the Attorney General and Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.	Yes	various	log of e-mails	correspondence regarding damages	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
290	2004/12/07	Oklahoma Office of the Attorney General	Yes	Motley Rice LLC (cc: Landreth Law Firm, Miller Keffer Bullock Pedigo LLC, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc., Oklahoma Office of the Attorney General,	e-mail	correspondence attaching draft chart regarding damages	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
291	2004/11/18	Oklahoma Office of the Attorney General	Yes	Stratus Consulting, Inc., Landreth Law Firm (cc: Miller Keffer Bullock Pedigo LLC)	e-mail	correspondence regarding Oklahoma Department of Agriculture enforcement	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none

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292	2004/11/17	Oklahoma Office of the Attorney General	Yes	Landreth Law Firm, Stratus Consulting, Inc. (cc: Miller Keffer Bullock Pedigo LLC)	e-mail	correspondence regarding Oklahoma Eastern Shore Monitoring Program	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
293	2004/09/20	Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.	Yes	Motley Rice LLC, Oklahoma Office of the Attorney General, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc., Landreth Law Firm, Miller Keffer Bullock Pedigo LLC	memorandum	Memorandum regarding alternative remedies for repairing the environmental damage to the Illinois River Watershed and Lake Tenkiller and other affected Eastern Oklahoma watersheds	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
294	2004/05/16	Landreth Law Firm	Yes	Landreth Law Firm	e-mail	correspondence attaching Illinois River Damages spreadsheet	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
295	2004/11/29	Stratus Consulting, Inc.	No	Motley Rice LLC, Oklahoma Office of the Attorney General, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc., Landreth Law Firm, Miller Keffer Bullock Pedigo LLC	presentation	presentation entitled "Oklahoma Poultry Litigation"	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
296	various dates in 2004	various authors including those from Landreth Law Firm and Stratus Consulting, Inc.	Yes, in part	Motley Rice LLC, Oklahoma Office of the Attorney General, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc., Landreth Law Firm, Miller Keffer Bullock Pedigo LLC	log of notes and presentation portions	Damages Presentation 11/29/2004 - 11/30/2004	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
297	undated	Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc.	Yes	Motley Rice LLC, Oklahoma Office of the Attorney General, Riggs, Abney, Neal, Turpen, Orbison & Lewis, Inc., Landreth Law Firm, Miller Keffer Bullock Pedigo LLC	typed notes	typed notes on 11/29/04 Stratus Presentation	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none

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298	2004/12/21	Miller Keffer Bullock Pedigo LLC	Yes	Stratus Consulting, Inc.	e-mail	correspondence regarding proposed sampling	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	none
299	2003/04/04	Oklahoma Conservation Commission	No	Oklahoma Conservation Commission	e-mails	e-mails regarding monitoring agreement with Arkansas	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002801 - 0002803
300	2002/07/23	Oklahoma State University	No	Oklahoma Office of the Attorney General	draft Scope of Work	draft Scope of Work submitted to Attorney General's office estimating or establishing threshold phosphorus in IRW using SWAT	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002904- 0002906
301	2002/04/28	Oklahoma Water Resources Board	No	Derek Smithee, Phillip Moershel, Jon Craig, Mark Derichsweller, Oklahoma Conservation Commission, Oklahoma Office of the Attorney General, Ed Fite, Teena Gunter, Susan Krug, Dan Parrish, Michelle Sutton, Mike Smolen, Chris Bruehl (and cc: Duane Smith, Mark Coleman, Kristye Kirkshores, Mike Thralls)	e-mail	correspondence attaching handwritten annotations and also attaching document regarding possible implementation actions for phosphorus control	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002909 - 0002915
302	1997/07/30	Oklahoma Office of the Attorney General	Yes	Oklahoma Scenic Rivers Commission, Oklahoma Department of Environmental Quality, Oklahoma Water Resources Board, Oklahoma Conservation Commission, Oklahoma Secretary of the Environment	fax	correspondence regarding citizens' suit	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0003264 - 0003267

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303	2002/08/06	Oklahoma Conservation Commission	No	Margaret Blevins	e-mail	correspondence regarding bacterial data request	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002695
304	2005/03/31	Oklahoma Conservation Commission	No	Margaret Blevins	e-mail	correspondence regarding a reference stream	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002717
305	2005/04/05	Margaret Blevins	No	Oklahoma Conservation Commission	e-mail	correspondence regarding a reference stream	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002718
306	2004/09/21 - 2004/09/22	various (including Oklahoma Conservation Commission, Dan Storm, Margaret Blevins)	No	various (including Oklahoma Conservation Commission, Dan Storm, Margaret Blevins)	e-mails	correspondence regarding reference streams	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002739
307	2005/03/31	Oklahoma Conservation Commission	No	Oklahoma Conservation Commission	e-mails	correspondence regarding water quality sites	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002756 - 0002757
308	2004/10/14	Oklahoma Office of the Attorney General	Yes	Oklahoma Conservation Commission	letter	correspondence regarding data on Illinois River and other listed watersheds	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney-client privilege	0002762